

**From:** [Larry Peyton](#)  
**To:** ["Dean Lewis"](#); [environmental@usa.com](#); [Moore, Gary](#); [joelh@lonestarecology.com](#); [willw@lonestarecology.com](#)  
**Subject:** RE: CES ASTs Removal  
**Date:** Wednesday, April 08, 2015 9:31:27 AM  
**Attachments:** [image001.png](#)

Mickey, I have a copy of the RCRA empty container guidance. I thought you said you could get a "waiver" from the TCEQ, specific to what we proposed on moving the tanks and if we needed to scrap some out. This also doesn't address the asbestos issue that the Texas Department of Health requires. We can't move on this until we have a certain course that will not result in any violations with the agency policies. Thanks.

**From:** Dean Lewis [mailto:[deanl@lonestarecology.com](mailto:deanl@lonestarecology.com)]

**Sent:** Tuesday, April 07, 2015 2:47 PM

**To:** 'Will Wilson'

**Cc:** 'Larry'

**Subject:** FW: CES ASTs Removal

**Importance:** High

Will,

For whatever reason Mickey could not get email to go through to either you, Larry or I. I had him send information to my wife's email and that worked.

Please see the email path concerning the AST's at CES site.

Thanks

Dean

**From:** Debbie W [mailto:[\(b\) \(6\)](#)]

**Sent:** Tuesday, April 7, 2015 1:13 PM

**To:** Dean Lewis

**Subject:** FW: CES ASTs Removal

Found this in my email too.

**From:** [environmental@usa.com](#)

**To:** [lpeyton@lonestarecology.com](#); [deanl@lonestarecology.com](#)

**CC:** [Moore.Gary@epa.gov](#); [\(b\) \(6\)](#)

**Subject:** Fw: RE: RE: CES ASTs Removal

**Date:** Tue, 7 Apr 2015 19:53:46 +0200

Larry,

See the attachment.

**Michael "Mickey" Edmondson**

18604 East F.M. -1097

Willis, Texas 77378

936.900.1475 cell

936.856.7314 home

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**Sent:** Tuesday, March 31, 2015 at 9:10 AM

**From:** "Terry Andrews" <[Terry.Andrews@tceq.texas.gov](mailto:Terry.Andrews@tceq.texas.gov)>

**To:** "Mickey Edmondson" <[environmental@usa.com](mailto:environmental@usa.com)>

**Subject:** RE: RE: CES ASTs Removal

Mickey,

I checked with Nicole Bealle and she said that the ASTs should be empty and not contain any liquids during move/transport.

Thank you,  
Terry

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**From:** Mickey Edmondson [<mailto:environmental@usa.com>]

**Sent:** Tuesday, March 31, 2015 5:39 AM

**To:** Terry Andrews

**Subject:** Re: RE: CES ASTs Removal

Terry,

Thanks for the Regulatory Guidance Document (RG480). The ASTs are RCRA Clean, will be shipped to permitted disposal facility (Lonestar Ecology) for reuse. You will be notified prior to implementing the removal activities and provided a copy of the Bankruptcy Court's approval post the Trustee's receipt thereof.

**Michael "Mickey" Edmondson**

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**Sent:** Monday, March 30, 2015 at 1:16 PM

**From:** "Terry Andrews" <[Terry.Andrews@tceq.texas.gov](mailto:Terry.Andrews@tceq.texas.gov)>

**To:** "Mickey Edmondson" <[environmental@usa.com](mailto:environmental@usa.com)>

**Subject:** RE: CES ASTs Removal

Mickey,

By "RCRA clean" do you mean "RCRA empty" status? Please see that attached guidance for dealing with empty waste containers. Note that there are additional requirements if a container stored an acutely hazardous material. Is this being done through the bankruptcy trustee?

Thanks,

Terry

Terry Andrews, P.G., Team Leader

Remediation Division

Texas Commission on Environmental Quality

Ph: 713.767.3560



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**From:** Mickey Edmondson [<mailto:environmental@usa.com>]

**Sent:** Monday, March 30, 2015 11:47 AM

**To:** Terry Andrews

**Cc:** Gary Moore; Dean Lewis

**Subject:** CES ASTs Removal

Terry,

Lonestar Ecology is entertaining the possibility of removing the ASTs located at the CES site and erecting the ASTs at their facility. The EPA has completed the removal/disposal of the liquids/sludge's contained within the ASTs and have pressured washed the interiors. The ASTs currently meet the criteria for attainment of RCRA clean status and can be transported to the Lonestar facility. Therefore, other than notifying the TCEQ of Lonestar's removal activities, what are your requirements?

**Michael "Mickey" Edmondson**

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| | writing by Michael Edmondson.